

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:22-CV-15-FL**

ROBERT TERRACINO and  
BRADIE TERRACINO, Individuals,

Plaintiffs,

v.

TRIMACO, INC.,

Defendant.

**DEFENDANT'S EXPEDITED  
MOTION TO COMPEL  
DISCOVERY**

COMES NOW Defendant Trimaco, Inc. ("Trimaco") and, pursuant to Fed. R. Civ. P. 26, 34 and 37, moves this Court, on an expedited basis, to compel Plaintiffs to produce all documents requested in Defendants' Requests for Production (the "Requests"). Defendant requests additionally that Plaintiffs be ordered to respond to this Motion no later than December 27, 2023, and to produce the documents sought well in advance of the Court's *Markman* hearing scheduled for February 1, 2024. The grounds for this Motion are set forth in Trimaco's Memorandum of Law, which is being submitted contemporaneously herewith.

Respectfully submitted this 18<sup>th</sup> day of December, 2023.

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*\*by special appearance*  
*\*\*special appearance forthcoming*

*Counsel for Defendant Trimaco, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

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